Mr. Richard B. Bender Richard B. Bender Corrosion Associates P. O. Box 11302 Fort Worth, TX 76110

Dear Mr. Bender:

In your letter of January 17, 1974, you asked about corrosion control requirements for steel risers on plastic service lines.

Steel risers on plastic services must be coated and cathodically protected as required by Section 192.455 of Subpart I of the Federal regulations. So as to facilitate cathodic protection, each service riser must be electrically insulated from other house piping such as at the regulatory shut-off valve or meter as required by Section 192.467(b). the level of protection must meet one or more of the criteria contained in Section 192.463.

Also, the frequency for monitoring the cathodic protection applied to service risers is covered by Section 192.465.

We trust this clarifies the requirements for corrosion control measures applicable to steel risers on plastic services. If you desire any further information, please advise.

Sincerely,

/signed/

Joseph C. caldwell Director Office of Pipeline Safety

Mr. Joseph Caldwell

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Office of Pipeline Safety Department of Transportation Washington, D. C. 20590

Dear Mr. Caldwell:

We are concerned with Section 192.463 of the 49 CFR. We have been finding numerous situations where plastic pipe has been used in service lines up to the point a transition fitting and steel riser (coated steel) is connected underground and rises above ground to the regulator or meter. We have found a number of these metal risers developing corrosion leaks simply because they are not isolated from the house piping (which connects the short section of riser to the copper water system underground at the house). We have also found fairly aggressive pitting even when the coated steel riser pipes are isolated but not cathodically protected.

Our interpretation on these steel gas risers is that they have to be coated, isolated and placed under cathodic protection. Are we correct? Or is the criteria of protection removed from this.

I have raised this question because a local gas company in one of the towns that we have been working has informed the plumbers who have been installing these plastic services and steel meter risers "that insulating fittings and anodes are not necessary on this short section of pipe," yet it is in one of the most hazardous locations (particularly when under concrete slabs and paved parking areas) that which we have to concern ourselves. In many areas a gas leak at this location particularly when it is intermediate pressure upstream from the regulator is more hazardous than a gas leak ten, twenty or thirty feet away on a service. I need an answer to this question in a manner that will convince then that the Federal law is as written.

Sincerely,

Richard B. (Pipe) Bender